

JAP:JAM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**15 M 322**

-----X

UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 21 U.S.C. §§ 952(a)  
and 960)

THENGA ADAMS,

Defendant.

-----X

EASTERN DISTRICT OF NEW YORK, SS:

Joshua Schottenfeld, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about April 7, 2015, within the Eastern District of New York and elsewhere, the defendant THENGA ADAMS did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:<sup>1</sup>

---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

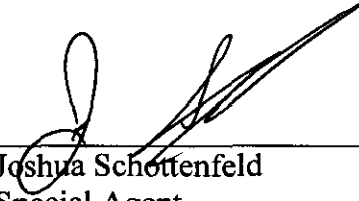
1. On or about April 7, 2015, the defendant THENGA ADAMS arrived at John F. Kennedy International Airport in Queens, New York, aboard Caribbean Airlines Flight No. 524 from Guyana via Trinidad and Tobago.

2. The defendant THENGA ADAMS was selected for a Customs and Border Protection ("CBP") examination. He submitted two items for inspection, a gold suitcase and a black suitcase. After answering standard CBP questions, the defendant THENGA ADAMS stated in sum and substance that the suitcases and their contents were his and that he packed both of the suitcases.

3. During an inspection of the defendant THENGA ADAMS' two aforementioned suitcases, CBP officers observed four pairs of athletic sneakers, two pairs from each suitcase. CBP officers noticed that the sneakers appeared to be unused and were unusually light. Probes were inserted into the heel area of each sneaker's sole and revealed a white powdery substance, which field-tested positive for cocaine. The approximate gross weight of the substance is 786.4 grams, with approximately 389 grams recovered from the two pairs of sneakers in the defendant's gold suitcase and approximately 397.4 grams recovered from the two pairs of sneakers in the defendant's black suitcase.

4. The defendant was arrested and advised of his Miranda rights. The defendant stated that he understood his rights and agreed to speak with law enforcement without an attorney present. The defendant then stated in sum and substance that he knew the sneakers contained illegal drugs.

WHEREFORE, your deponent respectfully requests that defendant THENGA ADAMS be dealt with according to law.

  
\_\_\_\_\_  
Joshua Schottenfeld  
Special Agent  
Homeland Security Investigations

Sworn to before me on  
the 8<sup>th</sup> day of April, 2015

\_\_\_\_\_  
THE HONORABLE LOIS BLOOM  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK